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August 7, 2025

Honorable Sidney H. Stein
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY

Re: 25-cv-5904, Pennantia, LLC v. Rose Cay Maritime, LLC and Dove Cay, LLC
Request for Deadline Extension and to Exceed Page Limits

Your Honor,

We represent Plaintiff Pennantia, LLC (“Pennantia”). Pennantia currently has a deadline of tomorrow, August 8, to file its reply papers to the opposition papers filed by Defendant Dove Cay, LLC (“DC”) on the maritime lien issue pending before the Court scheduled to be heard on Tuesday, August 12 at 11:00 am EDT. We write to seek an extension of time on filing Pennantia’s reply papers as well as an extension of the standard 3,500 word reply brief limit. This is Pennantia’s first request with respect to these issues. We conferred earlier this afternoon with counsel for DC to obtain their position on Pennantia’s requests, but DC’s counsel has not yet responded.

As Your Honor may recall, DC originally had a deadline of Friday, August 1, by which it was to file its opposition papers. DC requested, and was granted, a delay to Monday, August 4 to file. Your Honor kept Pennantia’s original deadline of Friday, August 8, for filing Pennantia’s reply papers in place.

Counsel for Pennantia has sought to adhere to the Friday deadline but additional events – most significantly the arrest of the *Tug LYNNE M. ROSE* and the *Tank Barge RCM 270* in Panama and the need to try to coordinate the filing of a motion to vacate that arrest in Panama with Panamanian counsel (as well as address concerns being raised by the charterers of those vessels as a result of the arrests) – have made completing the reply papers within the scheduled reply period virtually impossible when adding in the approximate 2½ fewer days allotted to that task. Accordingly, we respectfully request that the Court set Sunday, August 10, at 5 pm EDT, as the revised deadline by which Pennantia file its reply papers. This deadline still provides Pennantia approximately 24 hours less time than it would have had when the briefing was scheduled, but we are confident that this revised deadline can be met.

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Counsel for Pennantia also respectfully requests that the Court permit Pennantia to exceed the typical 3,500 word limit for reply briefs in Your Honor's Individual Rules due to the unusual circumstances presented here. For the first time in the over three years that the relationship amongst Pennantia and Defendants has existed, Pennantia has seen a written contract that purports to define the RCM/DC relationship. This agreement – not submitted in this proceeding but only provided by DC's counsel after we wrote to this Court to order its production – raises several issues that will require space to brief cogently and thoroughly such that the current 3,500 word reply brief limit would not be sufficient.

As the Court may be aware, Pennantia's initial brief addresses the maritime lien issues in only about 7 pages of that document. Pennantia respectfully requests that it be permitted to file a reply brief of 7,000 words (twice the size of a standard reply brief and approximately the same length as DC's opposition brief), which request still would limit the collective pages submitted by Pennantia on the maritime lien issue to fewer pages than to which a movant would be entitled in a traditional briefing package.

We thank Your Honor for his attention to this matter, and look forward to receiving the Court's decision.

Respectfully submitted,

HOLLAND & KNIGHT LLP

s/ Michael J. Frevola
Michael Frevola